

# **EXHIBIT Q**

**Barnet, Emily**

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**From:** Carome, Patrick  
**Sent:** Friday, January 31, 2020 5:31 PM  
**To:** Steven S. Biss  
**Cc:** Chuck Seyfarth; Holtzblatt, Ari; Barnet, Emily  
**Subject:** RE: Subpoena to Twitter in Fitzgibbon v. Radack

Steven,

As indicated in the voicemail Ari and I just left for you, Twitter requests that, in light of the potential imminent settlement of the Fitzgibbon litigation, you agree to another short extension of the deadline for Twitter to object to or move to quash the third-party subpoena you have propounded to Twitter. Would you agree to extend those deadlines until the end of the day on Thursday, February 6? Please let us know as soon as possible.

Regards,

**Patrick J. Carome | WilmerHale**  
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**From:** Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>  
**Sent:** Friday, January 31, 2020 2:45 PM  
**To:** Carome, Patrick <[Patrick.Carome@wilmerhale.com](mailto:Patrick.Carome@wilmerhale.com)>  
**Cc:** Chuck Seyfarth <[CSeyfarth@ohaganmeyer.com](mailto:CSeyfarth@ohaganmeyer.com)>; Holtzblatt, Ari <[Ari.Holtzblatt@wilmerhale.com](mailto:Ari.Holtzblatt@wilmerhale.com)>  
**Subject:** Re: Subpoena to Twitter in Fitzgibbon v. Radack

**EXTERNAL SENDER**

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Pat,

I can talk at 4PM.

**From:** Carome, Patrick  
**Sent:** Friday, January 31, 2020 9:08 AM  
**To:** Steven S. Biss  
**Cc:** Chuck Seyfarth ; Holtzblatt, Ari  
**Subject:** RE: Subpoena to Twitter in Fitzgibbon v. Radack

Steven,

Please let us know when you are available for a call today with Ari and me. We are free from now until 11am, from 11:30 to noon, from 2:15 to 2:45, or 4 to 5:30. Thank you.

**Patrick J. Carome | WilmerHale**  
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**From:** Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>  
**Sent:** Thursday, January 30, 2020 5:09 PM  
**To:** Carome, Patrick <[Patrick.Carome@wilmerhale.com](mailto:Patrick.Carome@wilmerhale.com)>  
**Cc:** Chuck Seyfarth <[CSeyfarth@ohaganmeyer.com](mailto:CSeyfarth@ohaganmeyer.com)>; Holtzblatt, Ari <[Ari.Holtzblatt@wilmerhale.com](mailto:Ari.Holtzblatt@wilmerhale.com)>; Steven Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>  
**Subject:** Re: Subpoena to Twitter in Fitzgibbon v. Radack

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**EXTERNAL SENDER**

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Pat,

I am in a mediation in Nova right now in the Radack matter. If the case settles, the subpoena will be withdrawn. I am in WVa tomorrow. Will look at my calendar this evening, and confirm when I can be available.

Steven S. Biss  
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**From:** Carome, Patrick  
**Sent:** Thursday, January 30, 2020 5:01 PM  
**To:** Steven S. Biss  
**Cc:** Chuck Seyfarth; Holtzblatt, Ari  
**Subject:** RE: Subpoena to Twitter in Fitzgibbon v. Radack

Steven,

Ari and I would like to speak to you tomorrow regarding the subpoena. Can you suggest a time that would work for you. I am free except between 11am and 2 pm. Thanks.

Pat

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**From:** Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>  
**Sent:** Friday, January 24, 2020 1:38 PM  
**To:** Carome, Patrick <[Patrick.Carome@wilmerhale.com](mailto:Patrick.Carome@wilmerhale.com)>  
**Cc:** Chuck Seyfarth <[CSeyfarth@ohaganmeyer.com](mailto:CSeyfarth@ohaganmeyer.com)>; Holtzblatt, Ari <[Ari.Holtzblatt@wilmerhale.com](mailto:Ari.Holtzblatt@wilmerhale.com)>  
**Subject:** Re: Subpoena to Twitter in Fitzgibbon v. Radack

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**EXTERNAL SENDER**

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Pat,

Agreed that the deadline for Twitter to respond to the subpoena is extended to 2/3. As I said, my trial is in July and the discovery cut-off is in early March. I am not willing to extend the deadline further, especially since I expect nothing but objections from Twitter, which we will need to take up immediately with Judge Payne.

Radack???s communications with the user or users of @DevinCow is relevant, *inter alia*, to the issue whether she breached the settlement agreement at issue. Here is the photograph of Radack in the cow costume: